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Good morning, and thank you for the invitation and opportunity to testify before the Little Hoover Commission. Today, the Commission is reviewing educational governance to identify reforms that will improve student outcomes. Since 1999, with the passage of the Public Schools Accountability Act, the state of California has implemented two primary assistance programs to provide additional funds for low-performing schools: the Immediate Intervention/ Underperforming Schools Program (known as II/USP) and the High Priority Schools Grant Program (HPSGP).

The American Institutes for Research (AIR) has conducted three evaluations of these programs¹, and I have been asked share the results of those evaluations with the Commission today.

There is considerable overlap as well as differences between the II/USP and the HPSGP. Both sought to improve instruction and student learning by focusing public and educator attention and by providing additional financial resources to help schools improve. They shared similar components, such as requiring the use of an External Provider in developing an Action Plan to guide school reform. Under both programs, schools not making expected progress after a certain period would then be subject to sanctions – which to date has largely been entering into a contract with a School Assistance and Intervention Team (SAIT). SAITs are teams of educational consultants – often retired educators, and other individuals from private companies, county offices of education, and nonprofit organizations – who work with and monitor schools to improve student achievement.

The II/USP (which is no longer in effect) was implemented over the course of two to

¹ (1) O'Day, J.A. & Bitter, C. (2003). *Evaluation of the Immediate Intervention/Underperforming Schools Program and the High Achieving/Improving Schools Program of the California Public School Accountability Act of 1999*. Palo Alto: CA: American Institutes for Research.

(2) Bitter, C., Perez, M., Parrish, T., Gonzalez, R., Socias, M., Salzfass, L., Chaney, K., Gubbins, P., Anand, P., Dawson, K., Yu, V., Delancey, D., & Esra, P. (2005). *Evaluation Study of the Immediate Intervention/Underperforming Schools Program of the Public Schools Accountability Act of 1999*. Palo, Alto, Ca: American Institutes for Research.

(3) Harr, J.J., Parrish, T., Socias, M., & Gubbins, P. (2007). *Evaluation of California's High Priority Schools Grant Program: Final Report*. Palo Alto, CA: American Institutes for Research.

three years and provided \$200 per student to applicant schools in the lowest five deciles of the Academic Performance Index (API). The HPSGP targeted more funds – \$400 per student – to the lowest-performing schools in decile 1 of the API over the three to four years. It further allowed entities other than state-approved External Evaluators to provide technical assistance.

Considering the 658 schools that participated in the HPSGP, more than \$740 million in HPSGP funds were allocated, averaging about \$1 million per school across the duration of the program.²

Overall Findings

On average, II/USP and HPSGP schools showed gains in student performance during the periods of program implementation. However, the effect of participating in the programs on student performance was negligible. That is, there were very little or no differences in student performance between comparison schools and those participating in these programs.³

All three evaluations pointed to the influence of local districts as mediating the effects of participation in these programs. While district policies and support were perceived as critical to some schools' improvement activities, these supports did not appear to be consistent nor present in all schools.

The second evaluation of the II/USP explored the implementation of the SAIT component. Although it did not assess its effectiveness in improving outcomes,⁴ the study found that the level of services provided by SAITs and the participation of districts in the SAIT process varied substantially. School respondents' perceptions were mixed regarding the helpfulness of SAITs, and respondents were unclear on subsequent sanctions if schools failed to improve under the SAIT process. The study authors recommended that the state undertake ongoing and systematic data collection and assessment of the effectiveness of individual SAIT providers.

The HPSGP evaluation found considerable breakdowns in implementation. For example, over 40 percent of school respondents indicated that the district had not actively assisted them in regard to program implementation. Half of the school respondents expressed concern about the length of the program, and a third said that funding had not arrived in a timely fashion and therefore did not fully permit appropriate planning and spending. Considerable HPSGP funds were carried over each year, which was often described as reflective of other systemic implementation breakdowns.

² Nearly half of these schools (n = 307) were mixed program schools (e.g., participating in both the HPSGP and the II/USP or Comprehensive School Reform). AIR's evaluation of the HPSGP focused on the 351 HPSGP schools that did not also participate in the II/USP or CSR.

³ The achievement analyses for the HPSGP evaluation included a subset of HPSGP schools (n = 229) that a) did not participate in II/USP or Comprehensive School Reform, b) received a planning grant, and c) received the first round of implementation funds.

⁴ The California Department of Education has commissioned an independent evaluation study of the implementation, effectiveness, and impact of the SAIT.

Other HPSGP findings included:

- Although more than 60 percent of school respondents reported that a plan for school improvement prominently guided their reform efforts, this reported impression was not reflected in measured academic gains.
- While nearly half of the school respondents described their external provider support as appropriate and effective, nearly 45 percent of the surveyed respondents reported that the school did not use, or reported that they did not know if the school used, an external provider in the development of the Action Plan, even though it was a program requirement.
- Spending on personnel was reported as the most common and the most effective local use of HPSGP funds.
- HPSGP was perceived as having a major role in student achievement gains, despite nearly identical academic performance during this period between HPSGP and non-HPSGP comparison schools.
- A slight majority of respondents reported a lasting HPSGP impact in areas of school capacity.
- While 60 percent of school respondents indicated confidence in sustaining the impact of HPSGP, only 40 percent said they had been able to find funding to continue these reforms.

Perhaps the major question arising from these findings is why such a large investment shows no appreciable results. In addition, it seems important to ask whether the program should be more rigorously implemented as is, should be changed in modest ways, radically altered, or dropped altogether.

General Observations

Overall performance of low-performing schools (both those participating and not participating in these programs) is improving in an era in which state and federal accountability systems have been introduced. The accountability movement, including interventions like the II/USP and HPSGP, has cast an important spotlight on chronically underperforming schools. An expectation is being conveyed to state, district, and school administrators that the status quo for these schools is no longer acceptable.

This increased attention paid to the state's lowest-performing schools is laudable, and has yielded some positive results for these schools on average as well as for all schools statewide. State and federal accountability efforts have likely made a substantial contribution to this improved performance, and it seems likely that in a generic sense, the II/USP and HPSGP contributed to these overall gains as well.

At the same time, analyses of school- and student-level achievement for these evaluations show no meaningful difference between schools participating in the programs and comparison schools.

Recommendations

Based on our findings, it appears that a short-term categorical approach to school reform is insufficient to overcome much larger system inadequacies that fail to provide the kinds of long-term support and assistance needed to substantially and consistently improve student performance in the state's most challenged schools. We suggest terminating categorical interventions like the HPSGP in favor of more comprehensive statewide school reform that provides long-term administrative and resource support to the state's lowest-performing schools enrolling our most academically challenging students.

However, we also understand broad-reaching state reform to be an unlikely immediate alternative. In the interim, we recommend that the state consider alternative investments to bolster the performance of the state's lowest-performing schools, as opposed to relying on II/USP- and HPSGP-type interventions.

Within this overall context, we offer two categories of recommendations below. We begin with general state-level recommendations, irrespective of the future of the HPSGP, and conclude with specific improvements to the program that may foster a greater impact.

General Recommendations

1. Keep the attention on student learning and low-performing schools

State and federal standards-based policies have been very successful in capturing the attention of the education community and the general public and focusing that attention on student outcomes system-wide and on low-performing schools in particular. We urge that this attention continue.

2. Consider the resources needed for sustained academic success in low-performing schools, and ensure that they are present and maintained in these schools and their districts

The state should identify the resources needed in the state's most challenging, highest-poverty schools, fund them accordingly, and ensure that these resources are allocated effectively by districts to schools.

Since the district was found to be a key intermediary between state-level policy and school-level implementation, the state should ensure that districts have the resources to provide the necessary assistance and support to their schools, and that they allocate them to low-performing schools as needed.

3. Use data on an ongoing basis to identify the extent to which state-level programs make an impact, and use these data to inform and alter state-level policy and programs in support of low-performing schools as needed

As the state sets expectations for schools and districts and encourages them to regularly use data as a basis for shaping policy and practice, we suggest the same process for the state. The state should attempt to actively determine fairly early on how well state-supported interventions are working.

We recommend early and rigorous assessment of a formative nature that can serve to guide and adjust implementation, and that is designed to compile evidence as early as possible about the extent to which anticipated outcomes are likely to be forthcoming. External evaluations provide a means to gain formative and summative information on programs. However, given the high-stakes environment and urgency to improve student outcomes, the state itself should establish more mechanisms to review policies regularly, assess what components of its policies are on the right track, and adjust policies on an ongoing basis as needed.

4. *Enhance the power of CBEDS*

Several of our case study sites and survey schools exhibited alarming principal turnover, and teacher turnover was also noted as a particular challenge to reform efforts. However, we were not able to compare this reported turnover to our designated comparison schools or other groups of interest, as this critical information is lacking in CBEDS. We recommend enhancing CBEDS to include questions on the number of years that principals and teachers have been at their current school, and the number of years in that same position in other schools. This enhancement to the database would serve as a powerful tool to understand staff turnover and its implications for student achievement.

5. *Foster data-driven decision making*

Many of the successful schools we encountered (through our HPSGP case studies, as well as evaluations of Proposition 227, II/USP, and high-poverty schools) at least partially attribute this success to regular assessments and review of data to drive instruction. Many of these systems were said to be locally developed. The state may want to encourage broader development and dissemination of such systems in districts and local schools. Unlike a number of other factors that have been repeatedly cited as making a difference in regard to school reform (e.g., strong leadership), data-driven decision making may be much easier to replicate.

6. *Recognize the influential role districts play in facilitating or constraining school improvement, and incorporate mechanisms into accountability policies to encourage positive and productive actions at the district level*

One of the key findings of this study was the potential influence of district context on schools' achievement growth. Although the HPSGP attempted to increase the involvement of the district in these reform efforts in relation to the II/USP, the findings from this study show that there is considerable room for improvement. The state's District Assistance Intervention Team (DAIT) process should further clarify the role of districts and counties in regard to assisting the state's lowest-performing schools.

7. *Consider methods to better align the state and federal accountability systems*

Site-level respondents in this study largely reported that while they consider the API to be a better outcome measure, they feel pressure to address AYP targets. This is not surprising given that 80 percent of the HP Only schools are in Program Improvement

(PI), with nearly half of the PI schools in Year 4 or 5 of the sanctions. Given the conflict and confusion associated with two overlapping accountability systems, we recommend that the state focus further on their alignment.

8. *Develop and foster policies that will strive for strength and continuity of school leadership, especially at low-performing schools*

Through the site visits and survey data, we have documented the common problem of excessive turnover in the leadership at low-performing schools. Conversely, where schools have appeared to thrive under these types of interventions, strong and ongoing school leadership was commonly found to be an integral part. While change in leadership may be the catalyst necessary to meaningful change, it appears very difficult for meaningful long-term planning and change to take hold without subsequent stability of leadership. We believe that a valuable role for the state, and a possible alternative investment to the HPSGP, would be to allocate funds for recruiting, training, and retaining strong principals in our state's most challenging schools.

9. *Work with districts to develop learning networks where districts and schools in need of improvement can be linked with, and can learn from, districts and schools that have been successful in improving outcomes with comparable populations of students*

In light of the limited communication reported and evident among schools participating in our evaluation, we recommend that the state and districts consider working in tandem to create opportunities for districts and schools to learn from one other. This could enhance knowledge transfer from schools showing substantial progress under reform efforts over time to schools new to and struggling with reform. Such learning networks might feature pairing of schools ("sister" schools) or clusters of schools that would collaborate and work together toward the common goal of enhancing student achievement.

10. *Look at other states' efforts to support their lowest-performing schools. Assess what investments they are making toward these ends and the degree to which they are experiencing results from these efforts*

As a result of national and state accountability systems across the country, many states are experimenting with interventions with the same basic intentions as the HPSGP, i.e., to improve performance in their most challenged schools and districts. We suggest an investigation into what other states are doing and what evidence they have found in regard to a return on these investments.

11. *Require participation in future evaluations*

As a grant precondition for any state program, districts and schools should agree to participate in state-approved evaluations of the programs. Soliciting the participation of districts and schools for this study took considerable persistence. As the state makes substantial investments in programs of this type, a reasonable pre-condition for participation is the state's right to collect data regarding whether this investment is cost

effective.

Specific HPSGP Recommendations

The following are recommendations if the state opts to continue with HPSGP-type interventions.

- 1. Target “failure” early: The CDE should monitor the performance of HPSGP schools annually and identify actions for schools that do not meet their API growth target in a given year.**

When schools are not showing progress annually (e.g., they do not meet their API growth target in a given year), there should be an increase in oversight, such as requiring ramped-up support from the district and possibly a required continuing role for the external provider. Conversely, when schools are showing progress, it may be advisable to add additional rewards, such as relaxed requirements (e.g., increased independence or flexibility to carry over funds beyond the final year of the grant).

- 2. Enhance the district role: The role of the district should be explicitly enhanced and the district should be held accountable for school progress and for establishing and maintaining “conditions” for success.**

We recommend that bolstered assurances for which districts will be held accountable be a prerequisite for school participation in the HPSGP. The analyses from this study suggest that active engagement of districts is an important pre-condition for program success. This recommendation mirrors the guidelines developed by the CDE for the second cohort of HPSGP schools, which institutes a continuous improvement process facilitated by a District/School Liaison Team. The guidance also calls for the Action Plan to demonstrate a clear support role for the district in the development and implementation of the plan and shared responsibility for school progress.

In fostering district accountability, we recommend that the CDE develop a system of rewards and sanctions at the district level that are associated with the success or lack thereof of participating schools. For example, in regard to the assurances above, district compliance should be especially closely monitored in cases where participating schools are not showing success. Initially, districts should be reminded of their responsibilities in regard to program implementation and that these assurances must be fulfilled to allow continued program participation. Ultimately, if districts do not comply and schools are continuing to fail, ongoing program funding should be withheld. Rewards for gains in student performance might come in the form of increased local discretion.

- 3. Improve monitoring: The CDE (perhaps with the assistance of the County Offices of Education) should enhance its monitoring of non-achievement-related measurements, such as compliance with the district assurances and expenditures.**

Along with these district assurances, we recommend regular reporting and monitoring. As the CDE is charged with allocating HPSGP funds, they should also be given the

responsibility and authority to ensure that the program is implemented as designed and to terminate the program in a given school or district-wide when this is clearly not the case.

4. *Redesign Annual Report: Collect data necessary to monitor assurances and school progress, and review on a regular basis.*

As described above, we recommend enhanced monitoring, and an important step in this direction is the modification of the current data collection under this program. The research team did not find the current Annual Report data to be particularly helpful in evaluating the program, nor had these data been analyzed in any systematic way prior to this evaluation. Changes to the Annual Report data collection could make the data more powerful and meaningful for monitoring HPSGP schools and districts.

While our survey collected respondent perceptions about key program components such as the external provider and district support, the fact that the evaluation was conducted at the end of (and even after) the program made collecting reliable measurements of implementation fidelity a challenge. We encourage the state to learn from evaluations of CSR model providers, such as *High Schools That Work*, that use ongoing survey measures to assess the extent to which participating schools are implementing the model with fidelity and how that relates to student outcomes. We recommend that the CDE redesign the Annual Report as a carefully constructed survey instrument that will provide indicators of implementation which can then be used, with other measures, to monitor schools as well as assess the relationship between implementation and student outcomes.

5. *Ensure predictable funding: The timing of the funds should be carefully considered for the next cohort, with explicit timelines to allow for effective school planning and clear expectations regarding a transition phase prior to program completion.*

The state and districts should provide clear directives and assurances as to when the funds will arrive at the school, how much, and with what degree of flexibility in carry-over. Districts with sufficient resources should support schools in implementing the program (e.g., allow schools to plan in the spring/summer) when state funds are delayed, and schools should be allowed time extensions in meeting their performance targets if the funds do not arrive at the school on time. For instance, if resources do not arrive at the school until mid-year, it may be unreasonable to expect that substantial academic growth will be realized through the program in that year.

To facilitate the continuation of reform, the CDE should provide clear expectations about a transition phase. For instance, districts and schools (through the external provider and District-School Liaison Team) should submit a transition plan at the beginning of the third year of implementation. This plan would assess the reforms/changes attributed to HPSGP funds, identify which strategies have been most effective, and identify resources necessary (e.g., financial and personnel) to allow the schools to continue key strategies beyond the HPSGP.

For the second cohort of HPSGP schools, CDE has prohibited annual carry-over. We strongly recommend that the CDE reconsider this restriction. While we observed

considerable carry-over in all years of the program, our case studies suggested that carry-over was an indicator of more systemic problems, such as disruption in school leadership. As an alternative, we encourage closer monitoring of carry-over, such as requiring schools with substantial carry-over to submit an explanation of the reasons and the implications for future planning.

6. *Ensure a supply of qualified external providers statewide, consistently describe the nature and duration of their role, and add measurements of their effectiveness to the program.*

Study respondents expressed concerns regarding the overall supply of qualified external providers. If this component is required as part of the HPSGP, the state has an obligation to be more proactive in ensuring an adequate and qualified supply. If the state does not have the capacity to develop this pool, then perhaps this component should not be required, or alternative options should be allowed.

In addition, a number of school respondents reported the external provider component as vaguely defined. This component also showed substantial variation in implementation. Although the external provider role is only required in legislation for the development of the Action Plan, it is further described in the second cohort guidelines as to “provide ongoing technical assistance to the school site administrative and teaching staff.” This language seems to imply a relationship with the external provider for the duration of the grant. The requirement should be fully clarified and the supporting language made as consistent as possible.

Last, the regular cycle of the continuous improvement process described in the second cohort guidelines should include an assessment of the effectiveness of the external provider, as currently there appears to be no accountability for these individuals who share a large responsibility in assisting the lowest-performing schools in the state.

Conclusion

On average, the state’s lowest-performing schools progressed during the period of HPSGP implementation. Although the schools participating in this program did not show gains that statistically differ from non-participating schools, all of the schools — as well as the state — deserve credit for their advances. The findings from this evaluation should not in any way detract from these accomplishments.

The challenge facing the state’s lowest-performing schools are daunting. Many of the educators who participated in the site visits and surveys convinced us of their dedication and determination in producing a brighter future for their students. It may simply be that the HPSGP was not enough. Ongoing systems of supplemental fiscal resources, selective staff placement, and other support are needed to substantially impact student outcomes in the state’s most challenged schools.

Given the primary purpose of the program, some may say that the finding of no substantial difference in student performance between HPSGP and comparison schools is the only result that matters. As this is the third study issued on behalf of the state showing

virtually no return in terms of enhanced student performance from the HPSGP and its predecessor II/USP, the question of whether to continue to invest in HPSGP-type interventions should be carefully considered by policy makers. Issues related to the need to improve student performance in the state's most challenged schools will not go away regardless of the future of the HPSGP.

We recommend that the state's commitment to low-performing schools not be diminished, but enhanced and re-directed. Because the current investments have not fully yielded the desired results, the need for a bolstered state commitment to equal educational opportunities for all children in California is perhaps greater than ever.